

Appl. No. 10/816,291  
Reply Filed: April 4, 2008  
Reply to Final Office Action of: October 4, 2007

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### REMARKS

In response to the Final Office Action mailed October 4, 2007, the Applicant submits this Reply. In view of the foregoing amendments and following remarks, reconsideration is requested.

Claims 1-5 remain in this application, of which claim 1 is independent. Claims 1-5 were rejected. No fee is due for claims for this amendment.

#### Objections to the Specification

The various words (Intel, IBM) mentioned in the Office Action are used as trade names, not as trademarks, and need not be capitalized or associated with a generic term. It is respectfully submitted that no amendments to the specification are required to comply with common practices for handling trademarks in a patent application.

#### Rejection Under 35 U.S.C. §103 of Claims 1-5

Claims 1-5 remain in this application, of which claim 1 is independent, were rejected under 35 U.S.C. §103 as being anticipated by U.S. Patent 6,133,914 ("Rogers") in view of US PG Pub. No. 2003/0085932 ("Samra"). The rejection is respectfully traversed.

According to Rogers, a user interface may be implemented by using a "data tree" to represent a "collection of nodes", each of which is a "data structure element . . . responsible for an object which may be rendered to the screen." See Rogers, Col. 6, lines 26-28, 39, 40. "[A]ny number [of trees] can be displayed at any time." Rogers, Col. 6, lines 41-42. In particular, a "dynamic tree 12 is a set of data nodes 24 which organize a set of internal objects 18 into logical relationships." Rogers, Col. 7, lines 10-12. "Each tree 12 is connected to a dynamic layout object 14 which controls the dynamic behavior of the on-screen objects 36 as they are displayed on the computer screen." Rogers, Col. 7, lines 20-22. "A dynamic object 14 includes the variables which affect the final layout." Rogers, Col. 7, lines 25-27. The process performed by the computer to implement a user interface, shown in Fig. 10 of Rogers, involves establishing a data tree (Col. 10, line 34) and loading the dynamic layout object with variables (Col. 10, line 44).

Rogers has little to do with the present invention. Claim 1(as amended) recites a graphical user interface with an editing window that permits a user to do three things:

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*"interactively edit . . . one or more transformation hierarchies including one or more geometrical transformation operators employing mathematical matrices, wherein a transformation operator provides transformation data as an output";*

*"interactively edit . . . one or more effects trees, wherein at least one effect operator in the effect tree has one or more inputs for receiving transformation data and has a local transformation specification that is combined with the received transformation data"; and*

*"connect an output of a transformation operator to an input of an effect operator for receiving the transformation data."*

As recognized in the Action, Rogers fails to disclose the latter two limitations. Rogers merely has a data tree representing objects, and a layout object with variables that specifies how the objects represented by the data tree should be displayed. Applicant respectfully indicates that the data tree in Rogers is not a transformation hierarchy as recited in amended Claim 1. The variables in Rogers are not an effect tree as claimed. Further there is no output from the Rogers' data tree that could be interpreted as being connected to an input in Rogers' layout object.

The Action asserts that Samra discloses a compositing tree with effects trees or operators for receiving multiple inputs where those inputs are "transformed" to create composited sequence of images. Applicant respectfully indicates that Samra fails to disclose *transformation operators employing mathematical matrices* as recited in Claim 1.

Accordingly, the rejection of independent claim 1 is traversed. The remaining claims 2-5 are dependent claims that are allowable for at least the same reasons.

### CONCLUSION

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this reply, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

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If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, please charge any fee to **Deposit Account No. 50-0876**.

Respectfully submitted,

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